

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

LUCIANO BARRAGAN, individually  
and as a representative of a class of  
participants and beneficiaries on behalf  
of the Honeywell 401(k) Plan,

Plaintiff,

v.

HONEYWELL INTERNATIONAL  
INC., and DOES 1 to 10 inclusive,

Defendants.

CIVIL ACTION NO.: 2:24-cv-04529

**ELECTRONICALLY FILED**

Judge: Hon. Evelyn Padin

**JOINT STIPULATION AND [PROPOSED] ORDER REGARDING  
SCHEDULING FOR DEFENDANT’S MOTION TO DISMISS**

Plaintiff Luciano Barragan and Defendant Honeywell International Inc. (“Defendant”), by and through their undersigned counsel, hereby agree and stipulate as follows:

WHEREAS, on February 13, 2024, Plaintiff filed a putative class action complaint against Defendant, (ECF 1);

WHEREAS, Defendant moved to dismiss the complaint on May 14, 2024, (ECF 45);

WHEREAS, on December 19, 2024, this Court granted Defendant’s motion to dismiss and dismissed Plaintiff’s complaint without prejudice, (ECF 71);

WHEREAS, Plaintiff timely filed an amended complaint on January 14, 2025, (ECF 72);

WHEREAS, Defendant intends to file a motion to dismiss the amended complaint (“Motion”);

WHEREAS, for good cause in light of the nature of the issues raised by the amended complaint and counsels’ professional work schedules, and to allow the parties sufficient time to prepare appropriate briefing, the Parties, through their undersigned attorneys and subject to the Court’s approval, have agreed to an extension of time to file the Motion and a modified briefing schedule;

THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and among the respective parties, that:

1. Defendant will file its Motion on or before February 14, 2025.
2. Plaintiff will file his response in opposition to the Motion on or before March 17, 2025.
3. Defendant will file its reply in support of the Motion on or before April 7, 2025.

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Dated: January 17<sup>th</sup>, 2025

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/s/ Lawrence C. Hersh

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*Attorneys for Defendant Honeywell  
International Inc.*

IT IS SO ORDERED, this \_\_\_\_\_ day of \_\_\_\_\_, 2025.

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THE HONORABLE EVELYN PADIN  
UNITED STATES DISTRICT JUDGE